



Entered on Docket  
January 20, 2011

A handwritten signature in black ink, appearing to read "Bruce A. Markell".

Hon. Bruce A. Markell  
United States Bankruptcy Judge

David M. Crosby, Esq.  
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Attorneys for Debtor

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In Re

JOSE PEREZ-CHACON  
MARIA IRMA PRADO DE PEREZ

Debtor

Case No. BK-S-09-30101-BAM  
Chapter 13

STIPULATED ORDER RE MOTION TO  
VALUE DEBTOR'S NON-PRINCIPAL  
RESIDENCE REAL PROPERTY

IT IS HEREBY STIPULATED BY AND BETWEEN Secured Creditor,  
WELLS FARGO HOME MORTGAGE ("WELLS FARGO HOME MORTGAGE"), through  
its counsel GREG WILDE, ESQ and Debtors counsel, DAVID M. CROSBY, ESQ., of  
the law firm of Crosby & Associates.

1. That the value of the subject Property described as follows: 204 Stanford  
Street, Las Vegas, NV 89107 ("Property"herein) and legally described as follows:

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2  
3 LOT THIRTY THREE (33) AND THIRTY FOUR (34) IN BLOCK TWENTY TWO (22) OF  
4 LAS VEGAS SQUARE SUBDIVISION, AS SHOWN BY MAP THEREOF ON FILE IN  
5 BOOK 1 OF PLATS, PAGE 96, IN THE OFFICE OF THE COUNTY RECORDER OF  
6 CLARK COUNTY, NEVADA. APN: 138-25-812-078, shall be adjudicated to be  
7 **\$40,000.00** for the purposes of bifurcating the claim of Secured Creditor, WELLS  
8 FARGO HOME MORTGAGE ("WELLS FARGO HOME MORTGAGE").  
9

10 2. That pursuant to the standard of In Re Enewally, the crammed-down  
11 value agreed to above shall be paid in full by Debtor through the plan and during the  
12 60-month life of the plan. Should the Debtor fail to pay the entire crammed-down value  
13 within that time, the Debtor will be responsible for the entire amount due under the  
14 original Note and Deed of Trust.

15 3. That the Debtor will be responsible for maintaining and paying taxes and  
16 insurance on the subject Property.

17 4. That should the Debtor default on their tax or insurance obligation and fail  
18 to repay Secured Creditor for any funds disbursed to cover their default or fail to remain  
19 current with Trustee, Secured Creditor shall send a 15-day written notice of default to  
20 Debtor and Debtor's counsel and , should the Debtor fail to cured their delinquency  
21 pursuant to said written notice, Secured Creditor may submit an Ex Parte Order  
22 Terminating the Automatic Stay. Upon entry of the Ex Parte Order, the Automatic Stay  
23 shall be immediately terminated and extinguished for all purposes as to Secured  
24 Creditor, WELLS FARGO HOME MORTGAGE ("WELLS FARGO HOME  
25 MORTGAGE"), its assignees and/or successors in interest.  
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1           5.       That Debtor shall file an amended Chapter 13 Plan providing for the  
2 additional terms listed above, within 10 days of the entry of this order.

3           IT IS SO ORDERED.  
4

5 Submitted by:  
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7  
8 DATED: \_1/18/2011\_\_\_\_\_

By: /s/ David M. Crosby  
David M. Crosby, Esq.  
Attorney for Debtor

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12 DATED: 1/18/2011\_\_\_\_\_

By: /s/ Greg Wilde  
Greg Wilde, Esq.  
Attorney for Secured Creditor